

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

Scott McCandliss, Dmidriy Abramyan,  
Abdikadir Ahmed, Ahmed Katun  
Ahmed, Ahmed Hassan, Ben Stewart  
Rountree, Faheem Iqbal Qureshi,  
Anthony D. Logan, Mohammed  
Abdulle, Hamoud S. Aldahbali, Jamal  
Abdi, Abdilahi Awale, and Mohamed  
A. Hussein,

Plaintiffs,

v.

Uber Technologies, Inc., Uber  
Technologies (GA), Inc., Rasier LLC,  
Keith Radford, Ahmed Simjee, Joshua  
Gantt, Leslie Gilmartin, Brian Giquel,  
Christopher Bosak, Christopher  
Johnson, Kevin Buttimer, Daniel  
Anderson, John Stettner, Rachel  
Pietrocola, Josh Varcoe, Fabian  
Fernandez, Aminur Choudhury, Seid  
Shek, Abebe Tesfaye, Samuel Worku,  
Jean Richard Pierre, Alexander  
Agbaere, Ayodele Okpodu, and Belay  
Dagnew,

Defendants.

CIVIL ACTION NO. 1:14-CV-03275-  
WSD

**JOINT MOTION FOR EXTENSION OF DEADLINES**

Plaintiffs and Defendants hereby jointly move the Court for an extension of each party's respective deadlines following Plaintiffs' filing of their Amended Complaint (Dkt. No. 29). Specifically, Defendants request an extension of seven days – through and including December 22, 2014 – to answer or otherwise respond to the Amended Complaint. In the event that any Defendant files a motion in response to the Amended Complaint, Plaintiffs request an extension of seven days – through and including January 15, 2015 – to respond to any such motions.

In support of their joint motion, the parties show the Court as follows:

1. On September 5, 2014, Plaintiffs filed their complaint in the Superior Court of Fulton County, State of Georgia. *See* Dkt. No. 1-2.
2. On October 10, 2014, Defendant Uber Technologies, Inc. (“Uber”) removed the state court action to this Court on the basis of jurisdiction conferred by the Class Action Fairness Act of 2005, 28 U.S.C. §§ 1332(d) & 1453. Dkt. No. 1.
3. Following removal, the Court granted Defendants' Unopposed Motion for an Extension of Time to Answer or Otherwise Respond to the Complaint (Dkt. No. 3), ordering Defendants to file a response to the Complaint by November 14, 2014. Dkt. No. 4.

4. On November 14, 2014, various Defendants filed a number of motions to dismiss pursuant to Fed. R. Civ. P. 12(b)(6). Dkt. No. 13, 15 & 17.

5. On November 26, 2014, Plaintiffs filed their Amended Complaint, as well as responses to the motions to dismiss. Dkt. No. 29, 30, 31 & 32.

6. Pursuant to Fed. R. Civ. P. 15(a)(3), Defendants' response to the Amended Complaint is due on or before December 15, 2014.

7. To further evaluate the new allegations in the Amended Complaint and to prepare a response thereto, Defendants respectfully request a short seven-day extension – through and including December 22, 2014 – to file an answer or other responsive pleading to the Amended Complaint.

8. In the event that any Defendant files a motion on December 22, 2014 in response to the Amended Complaint, pursuant to L.R. 7.1(B), Plaintiffs would have until January 8, 2015 to file a response. In light of the holiday season, Plaintiffs respectfully request a reasonable seven-day extension – through and including January 15, 2015 – to file any such opposition.

9. Counsel for Plaintiffs and counsel for Defendants have conferred and mutually agreed to the above requests. No party opposes any portion of the relief sought in this joint motion.

10. The requested extensions are carefully crafted to be as short as possible. This case is still in its early stages and the requested extensions, all of which are sought in good faith, will not unduly delay the resolution of this matter.

WHEREFORE, Defendants respectfully requests that the Court enter an order extending the time period in which Defendants shall file an answer or otherwise respond to the Amended Complaint through and including December 22, 2014. Plaintiffs respectfully request that the Court also enter an order extending the time period in which Plaintiffs shall respond to any motion filed by any Defendant through and including January 15, 2015. A Proposed Order is attached for the Court's convenience as Exhibit A.

Respectfully submitted, this 5th day of December, 2014.

/s/ William A. Pannell

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*Counsel for Defendants*

LOCAL RULE 7.1 CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing pleading filed with the Clerk of Court has been prepared in 14 point Times New Roman font in accordance with Local Rule 5.1(C).

Dated: December 5, 2014.

/s/ Michael W. Tyler  
Michael W. Tyler

**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 2014, I filed a copy of the foregoing document using the Court's ECF/CM system, which will automatically send notice of such filing to counsel for Plaintiffs:

William A. Pannell  
WILLIAM A. PANNELL, P.C.  
433 Chateau Drive, NW  
Atlanta, GA 30305

I further certify that on December 5, 2014, I served a copy of the foregoing to counsel for Plaintiffs by depositing a copy in the U.S. Mail, first class postage prepaid, addressed as follows:

Keith E. Fryer  
FRYER, SHUSTER & LESTER, PC  
1050 Crown Pointe Parkway, Suite 410  
Atlanta, GA 30338

/s/ Michael W. Tyler  
Michael W. Tyler